November 1, 2019

Ministry for the Environment
23 Kate Sheppard Pl,
Pipitea,
Wellington, 6011

Dear [Personal Details Removed]

Further to our conversation, held with the Meat & Wool Executive on 22 October 2019, we would like to reiterate our support for increasing the health of our waterways, where it is required. However, we would like to express our concern at the proposed method to measure and achieve this outcome.

Strong and forward thinking political leaders will recognise that enabling communities to take ownership of the issue will be a large part of formulating solutions and getting the required results. This national leadership approach will offer the opportunity for a trickle-down effect in developing community leadership. It will also allow those organisations with extensive knowledge, such as Federated Farmers, RMPP, Landcare Research, Beef + Lamb and DairyNZ to assist the government in supporting communities to achieve the desired fresh water outcomes. There is evidence that farmers learn best from farmers when changing practices.

We support the view that local solutions for local issues is key to achieving positive and long-term results in policy development and policy outcomes. Communities engaged from the earliest point in time become part of the solution. This allows the people who will be physically implementing the policy, either on a voluntary basis or with regulation, to supply feedback through this phase.

The Federated Farmers Meat & Wool Executive does not the support the view that in-stream health and farming are mutually exclusive. The key focus needs to be stream health and mitigating the effects of development. We do not think that one national measure of DIN or phosphorus are the appropriate measures required to achieve this. We believe a holistic approach to in-stream health is the key to achieving improved macroinvertebrate health and water quality.
There are a number of ways to approach the proposed water reforms, however, none of these options support a one size fits all approach. A community-by-community approach has shown to work and achieve results. A catchment level or geographic area approach effectively forms catchment communities (groups) or collectives. This option can be a viable alternative for achieving results that independent and audited farm plans may not, due to their silo approach. Catchment groups generate positive community buy-in, which regulation simply does not. There are many examples of catchment groups created over the past couple of decades, with more in recent times, responding to need. There is evidence that collectively these groups are making progress toward improving the health of waterways. Those that do not want to take the voluntary approach to catchment membership would need to have an alternate path covered by legislation to encourage them.

We have attached a couple of local examples that are making a difference on the ground. These examples have not been recognised in the proposals.

Federated Farmers would be happy to be part of a working group to continue this conversation and help develop more practical and easily digested solutions for all stakeholders, including farmers and the government.

Yours sincerely,

Federated Farmers Meat & Wool Chairperson